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*NOT ADMITTED TO THE NEW YORK BAR

January 27, 2021

By ECF

Hon. Ona T. Wang
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl St., Courtroom 20D
New York, NY 10007

RE: *Make the Road New York, et al. v. Ken Cuccinelli, et al.*, 19-cv-7993 ("MRNY");
State of New York, et al. v. U.S. Dep't of Homeland Security, et al., 19-cv-7777
("State of New York")

Dear Judge Wang:

We represent the Organizational Plaintiffs in these consolidated cases and write on behalf all parties to seek clarification on the filing deadline for the next joint letter on the status of discovery. This Court's Order dated October 23, 2020 required a joint status letter to be filed on December 2, 2020, and "every 60 days thereafter." *MRNY* Dkt. No. 264; *State of New York* Dkt. No. 237. Pursuant to that Order, the parties filed a joint status letter on December 2, 2020, and the next joint status letter is due February 1, 2021. This Court's memo endorsed Order dated December 15, 2020 required the parties

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to file a joint status letter on January 15, 2021. *MRNY* Dkt. No. 283; *State of New York* Dkt. No. 256. Pursuant to that Order, the parties filed a joint status letter on January 15. *MRNY* Dkt. No. 288; *State of New York* Dkt. No. 263.

The parties seek clarification on whether the Court wishes for the parties to submit a joint status letter on February 1, 2021. That is the next due date under the Court's October 23, 2020 Order, but is only seventeen days after the most recent joint status letter. The parties propose instead that the next joint status letter be due on March 16, 2021, 60 days from the most recent such letter. The parties are, of course, prepared to meet whatever deadline the Court would prefer.

Respectfully,

/s/ Daniel Sinnreich
Daniel Sinnreich